# Exhibit 1

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July 23, 2015

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#### Via E-mail

Hannah Lee Kramer Levin Naftalis & Frankel LLP 990 Marsh Road Menlo Park, CA 94025

Re: Finjan, Inc. v. Palo Alto Networks, Inc.

N.D. Cal. Case No. 3:14-cv-04908-EMC

#### Dear Hannah:

I write regarding your July 22, 2015 letter.

#### PAN's Technical Production

PAN has indeed completed its core technical production on the accused products listed in response to Finjan's Interrogatory No. 2. PAN will continue to produce additional technical information on its products as that information is located pursuant to PAN's reasonable search.

#### PAN's Source Code

Your statements regarding the source code are incorrect, unclear, and misleading. Months ago PAN produced the current version of the code for the accused firewall, cloud threat intelligence, and endpoint products, as well as representative former versions of the code that show when features were introduced or substantively changed.

PAN also made at least the following tools for code review available when the code was first produced: Windows (with standard search functionality and MS Visual Studio Ultimate), Linux (with grep functionality and vi), emacs, and UltraEdit. No other tools have been specifically requested to date. As PAN previously explained to Finjan, PAN is willing to entertain reasonable requests for other review tools, but Finjan must bear the expense of any tools not freely available.

# MORRISON FOERSTER

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## WildFire

PAN's response to Finjan's Interrogatory No. 2 includes PAN's products that use WildFire.

## Finjan's Production

Thank you for confirming again that Finjan agrees to produce "all discovery responses, expert reports, infringement and invalidity contentions, deposition transcripts of employees and experts, trial transcripts, and trial exhibits from its prior and co-pending litigations."

We note, however, that Finjan has remained silent on whether it will produce the prior art in the possession of its counsel that was produced to it by defendants in the prior and co-pending cases. Furthermore, you state that Finjan will not produce prior art produced to it by third parties. We request an *in person* meet and confer on these issues. I will be attending the *Finjan v. Blue Coat* trial on Friday, and we request that you, or a member of your team, meet with me during a break or after trial has concluded for the day.

#### **ESI** and Protective Orders

We will send revised versions of the ESI and Protective Orders, along with redlines showing the revisions, shortly (likely later today).

Sincerely,

/s/ Matthew A. Chivvis

Matthew A. Chivvis